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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

'07 MJ 2459

FILED 07 OCT 15 PM 1:58 CLERK, U.S. DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA BY: DEPUTY

UNITED STATES OF AMERICA, Plaintiff, v. **Angelica VILLARREAL-Chaidez** a.k.a. Reyna Olivia VILLARREAL-Chaidez a.k.a. Reyna Angelica CAMARGO Defendant.	Magistrate Case No. **COMPLAINT FOR VIOLATION OF** Title 18, U.S.C., Section 1546 (a) Misuse of Entry Document

The undersigned complainant being duly sworn states:

On or about **October 14, 2007,** within the Southern District of California, defendant **Angelica VILLARREAL-Chaidez (a.k.a. Reyna Olivia VILLARREAL-Chaidez and Reyna Angelica CAMARGO),** an alien, in applying for entry to the United States at the San Ysidro, California Port of Entry, did personate another by presenting to a United States Customs and Border Protection Officer a document of entry, to wit, a United States Passport, bearing the name of Reyna Angelica Camargo, in order to gain admission into the United States; in violation of Title 18, United States Code, Section 1546(a).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Signature of Complainant
~~Sara Esparagoza~~ U.S. Customs and Border Protection Enforcement Officer

Sworn to before me and subscribed in my presence, this 15th day of **October 2007.**

UNITED STATES MAGISTRATE JUDGE

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PROBABLE CAUSE STATEMENT

Defendant Angelica VILLARREAL-Chaidez aka: Reyna Olivia VILLARREAL-Chaidez, aka: Reyna Angelica CAMARGO came to the attention of U.S. Customs and Border Protection on or about June 2007 through a citizen's complaint. The reporting party alleged that the defendant assumed the identity of a deceased sister identified as Reyna Olivia VILLARREAL-Chaidez.

Subsequent investigation revealed that Immigration service records exist for Reyna Olivia VILLARREAL-Chaidez who first came to the attention of the Immigration and Naturalization Service (INS) on or about November 10, 1987 when alien Reyna Olivia VILLARREAL-Chaidez applied for and was granted residency in the United States. Reyna Olivia VILLARREAL died on October 24, 1990.

On January 21, 1991, defendant Angelica VILLARREAL-Chaidez applied for an Alien Registration Receipt Card utilizing her deceased sister's name and assumed the immigration status of said deceased alien. On June 15, 2001, defendant applied for Naturalization and was conferred U.S. citizenship on July 3, 2002. Based on this information, a CBP alert was generated to detain defendant upon her next application for entry into the United States.

On October 14, 2007 at approximately 0001 AM, defendant Angelica VILLARREAL-Chaidez aka: Reyna Olivia VILLARREAL-Chaidez, aka: Reyna Angelica CAMARGO applied for admission to the United States by vehicle through the San Ysidro Port of Entry. Defendant presented herself and one adult male passenger for inspection before a Customs and Border Protection Officer.

Defendant declared citizenship of the United States, produced a genuine United States passport bearing the name Reyna Angelica CAMARGO, and gave a negative Customs declaration. All occupants and the vehicle were escorted to vehicle secondary for a more thorough inspection.

Defendant was removed from the vehicle and escorted to a secondary office. A complete set of fingerprints were obtained from the defendant and compared with fingerprint records contained in the Alien Registration File assigned to Reyna Olivia VILLARREAL-Chaidez. An examination of the fingerprints was conducted verifying that the defendant's fingerprints did not match those belonging to Reyna Olivia VILLARREAL-Chaidez.

Defendant was advised of her Miranda rights, acknowledged her rights and agreed to submit to questioning without benefit of counsel. A video taped statement was obtained with the following declaration. Defendant denied using the identity of a deceased relative to procure an immigration benefit and subsequently acquire U.S. citizenship. Defendant admitted knowing Angelica VILLARREAL-Chaidez and declared that she is a sister who died in October 24, 1989.